

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

NO. 17-113

v.

JOHN CHRISTOPHER BROWN

CRIMINAL

MOTION TO DISMISS COUNT FORTY-TWO

AND NOW comes defendant, John Christopher Brown, to aver the following in furtherance of his motion to suppress, pursuant to advice of undersigned counsel:

- 1 John Brown has been charged at Count Forty-Two with possession of a photo of a naked minor, who is identified in government discovery materials as Minor#2.
2. Government discovery demonstrates that metadata does not support its claim of production and ownership by defendant John Christopher Brown.
4. A Memorandum in support of the foregoing is attached for review.

Submitted:

/s/ Diane S. Tosta

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